

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Johnny Timpson, by and through his )  
Conservator, Sandra Timpson, and Sandra )  
Timpson, in her individual capacity, )

Plaintiffs, )

vs. )

Nikki Haley, Governor of the State of South )  
Carolina, the Anderson County Disabilities and )  
Special Needs Board, Horace Padgett, )  
Chairman of the Anderson County Disabilities )  
and Special Needs Board, Dale Thompson, )  
former executive director of the Anderson )  
County Disabilities and Special Needs Board, )  
John King, current director of the Anderson )  
Disabilities and Special Needs Board, and The )  
South Carolina Department of Disabilities and )  
Special Needs (DDSN), William Danielson, )  
Chairman DDSN Commission, Beverly )  
Buscemi, Director of The South Carolina )  
Department of Disabilities and Special Needs, )  
The South Carolina Department of Health and )  
Human Services, Christian Soura, Director of )  
the South Carolina Department of Health and )  
Human Services, the Greenville County )  
Disabilities and Special Needs Board, and )  
Unknown Actors at the Anderson Disabilities )  
and Special Needs Board, and Unknown )  
Actors at the Greenville County Disabilities )  
and Special Needs Board, )

Defendants. )

CIVIL ACTION NO. \_\_\_\_\_

**RESPONSES TO LOCAL CIV. RULE 26.01  
(D.S.C.) INTERROGATORIES  
BY DEFENDANT ANDERSON COUNTY  
DISABILITIES AND SPECIAL NEEDS  
BOARD**

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, this Defendant submits the following answers to interrogatories as required by the Court:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: This Defendant is unaware of any entity that may have a subrogation interest at this time.**

(B) As to each claim, state whether it should be tried jury or non-jury and why.

**RESPONSE: This Defendant requests a jury trial.**

(C) State whether the party submitting these responses is a publicly-owned company, and separately identify: (1) each publicly-owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly-owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly-owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE: This Defendant is not a publicly-owned company.**

(D) State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division.)

**RESPONSE: This Defendant does not contest the filing of this case in this division.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: This Defendant is not aware of any similarly filed cases.**

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: This Defendant name is properly listed.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**RESPONSE: This Defendant is not currently aware of any such party or entity that is not already named to this suit.**

Respectfully submitted, this the 15th of April, 2016, in Columbia, South Carolina.

DAVIS FRAWLEY, LLC

s/Patrick J. Frawley

Patrick J. Frawley, Fed. I.D. #890

s/W. Joseph Maye

W. Joseph Maye, Fed. I.D. #11644

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ATTORNEYS FOR DEFENDANTS  
ANDERSON COUNTY DISABILITIES AND  
SPECIAL NEEDS BOARD, HORACE  
PADGETT, DALE THOMPSON, AND JOHN  
KING

Lexington, South Carolina  
April 15, 2016